

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

FILED

JUN 04 2024

Clerk, U.S. District Court
Eastern District of Texas

KATHLEEN LIEBERMAN,

Plaintiff,

v.

JUSTIN PAUL
WENDY WALKER

Defendants.

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)
)
) Case No. [4:23-cv-00]
)
4:23cv887

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY
AND BRIEF IN SUPPORT**

COMES NOW, Plaintiff, Kathleen Lieberman, and respectfully moves this Honorable Court for a Motion for Extension of Time to file reply to MOTION FOR SUMMARY JUDGMENT, WRIT OF HABEAS CORPUS, MOTION FOR ATTORNEY FEES, COST, EXPENSE. The Plaintiff requests that this Honorable Court consider and grant this Motion for Extension of Time, pursuant to Rule 6, Fed. R. Civ. P..

I. INTRODUCTION/ BACKGROUND/Brief in Support

Plaintiff does not foresee any need for further extension(s). In support of this motion, Plaintiff states as follows:

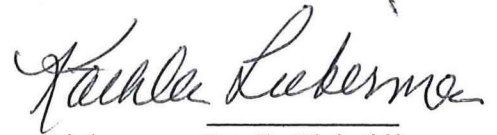
1. Plaintiffs filed a complaint against the defendants on October 16th 2023.
2. Mr. Lieberman was a Texas attorney and filed pro se' for both of us, I will continue pro se' at this time.
3. Mr. Lieberman passed away March 4th after months of illness.
4. I am not a trained attorney and need time to learn the court rules and law to properly REPLY.
5. Plaintiff is facing two opposing parties in this case. While plaintiff is representing herself as a Pro-se litigant, each of the opposing parties is represented by an attorney.
6. Plaintiff does not possess a law degree

IV. Prayer for Relief

1. Based on the foregoing, Plaintiff prays for the following relief:

- A. The plaintiff seeks the court to grant this unopposed motion for a 60 day extension of time to file Reply, making the Reply due August 4th 2024.

Respectfully submitted,

A handwritten signature in black ink, reading "Kathleen Lieberman". The signature is written in a cursive, flowing style.

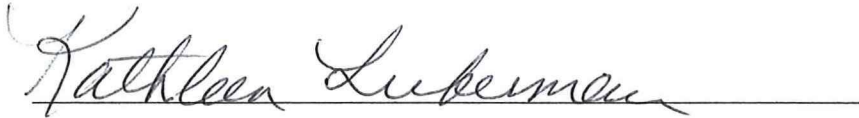
Kathleen Lieberman, Pro Se Plaintiff

1704 Pine Hills Lane Corinth, Texas 76210 [817-291-7082] [Kathleen.lieberman@yahoo.com]

CERTIFICATE OF
SERVICE

On (June 4, 2024) I, Kathleen Lieberman, filed (UNOPPOSED MOTION FOR EXTEND OF TIME in person to the court.

I hereby certify that I have served the forgoing document on all counsels and/or pro se parties of record in a manner authorized by Federal Rule of Civil Procedure 5(b)(2).



Kathleen Lieberman Pro Se Plaintiff

[Kathleen Lieberman][1704 Pine Hills Lane] [817-291-7082] [Kathleen.lieberman@yahoo.com]